REMARKS

The above amendments to the above-captioned application along with the following remarks are being submitted as a full and complete response to the Official Action dated March 23, 2007.

Applicants respectfully request the Examiner to acknowledge the claim to priority and the priority document in the next Office Action.

In view of the above amendments and the following remarks, the Examiner is respectfully requested to give due reconsideration to this application, to indicate the allowability of the claims, and to pass this case to issue.

Status of the Claims

Claims 1-19 are under consideration in this application. Claims 1-16 are being amended, as set forth in the above marked-up presentation of the claim amendments, in order to more particularly define and distinctly claim Applicants' invention. New claims 17-19 are being added.

The specification and the claims are being amended to correct formal errors and/or to better recite or describe the features of the present invention as claimed. All the amendments are supported by the specification. Applicants hereby submit that no new matter is being introduced into the application through the submission of this response.

Formality Objecting & Rejections

The Title of the Invention was objected to as being neither descriptive nor precise. Claim 14 was rejected under 35 U.S.C. §112, second paragraph, as being indefinite, and under 35 U.S.C. §101 for claiming non-statutory subject matter.

As indicated, the Title of the Invention and the claims are being amended as required by the Examiner. Accordingly, the withdrawal of the outstanding informality objection & rejections is in order, and is therefore respectfully solicited.

Prior Art Rejection

Claims 1-16 were rejected under 35 U.S.C. §103 (a) as being unpatentable over JP 2002-073480 of Tetsushi et al. (hereinafter "Tetsushi") in view of JP 2000-207304 of

Masanori et al. (hereinafter "Masanori"). Applicants respectfully traverse these rejections for the reasons set forth below.

The mail server 101 of the present invention (for example, the embodiment depicted in Figs 2 & 20) is connected to a mobile terminal 103 through a network 102 (Fig. 1), wherein the server 101 comprises a control unit 202 and a storage unit 201.

The storage unit 202 stores a word dictionary 20203 containing a plurality of words by category (e.g., place, name of cuisine, event, communication means, etc in Fig. 9; "*The structure of the word dictionary data 20203 is composed of the word number and the category name, as shown in FIG. 9.*" [0061] of the corresponding US. Pub. No. 20040038670; "*word dictionary data 20203 that describe words category by category*" [0060]) and a word-image associating dictionary 20208 (Fig. 10) associating the words with respective display information thereof by animation character movement, object, and background (Fig. 10; "*The word-image associating dictionary data describe the name of a character movement file, the name of an object file, and the name of a background file as the data associated with individual words.*" [0061]; "*text analyzing data 20204 to be used for analysis of inputted arbitrary texts, animation movement data 20205 that describe the movements expressed by the animations by each movements, object data 20206 being the object description data represented by clip arts, etc., background data 20207 served as the backgrounds for the animations, word-image associating dictionary data 20208 that describe the associations of the words with the display information of the words (the display information may be animation data)*" [0047]).

The control unit 201 controls the processes of: receiving, from the mobile terminal 103, an ID code of the mobile terminal 103, selected animation character information (e.g., Character C: a robot in Fig. 3), text information, and selected feeling expression information (e.g., in Fig. 7; [0057]); dividing the text contained in the text information into word units (e.g., Step 2001 in Fig. 20; "*The text analysis divides an inputted text [by an user] into words by a morphological analysis method such as the morphological analysis system `ANIMA`*" [0060]); collating each of the word units with the words in the word dictionary (e.g., Step 2002 in Fig. 20; "*the independent words such as `noun`, `verb`, and `adjective verb` are selected among the Ani_txt information, and the notations of end-form of the words are collated with the words of the word dictionary data 20203 stored in the hard disk 202 (S2002).*" [0060]); collating each collated word in the word dictionary with the display information in the word-image associating dictionary and extracting collated display information of an associated animation character movement, object, and background (e.g., Step 2004 in Fig. 20; e.g., "*The system analyzes the information inputted or selected by a user, creates an animation movement by using the analyzed information, and selects an object and a background by using the analyzed information.*" Abstract; "*When all of the plural words are hit, the pertinent movement, object, and background are extracted. As the*

result of collation, 'Eat_LAUMEN' as the animation movement associated with 'Ani = 0', 'eat', and 'Laumen', 'Laumen' as the object, and 'Back_Shinjuku' as the background are selected in this example. If Ani = 1, 'Eat_LAUMEN_hand' being the sign language animation data is selected, and the sign language movement is created from the data." [0062]); and synthesizing an animation image of the selected animation character **in a real-time manner ([0073])** using the extracted display information of the associated animation character movement and the selected feeling expression information; creating an animation file in which the synthesized animation image is stored together with the extracted display information of the associated object and the associated background in a superposed manner (e.g., Fig. 11; e.g., Step 2008 in Fig. 20; "*Next, the animation file creation program 20308 is started, the data associated with the animation movement, the object, and the background are retrieved from the animation movement data, the object data, and the background data, and the animation file having the retrieved data superimposed is created (S2008). For example, the background is served as the backmost layer, the object layer is created on the background, and the animation movement layer is laid on the object layer; and all of these layers are integrated into one animation file*" [0064]); and outputting the animation file to the mobile terminal 103 ("*The mailing system of the invention converts the text information into movement information using animations, object information, and background information, and sends/receives the converted information as a mail.*" Abstract).

The invention recited in claim 14 is directed to a computer-readable storage medium embedded with a program for making a mobile terminal having a controller, display, storage, and network interface execute a mail creation processing as controlled by the control unit of the mail server of claim 1.

The invention recited in claim 15 is directed to a mobile terminal which executes a mail creation processing as controlled by the control unit of the mail server of claim 1.

As recited in claim 17, the control unit 201 analyzes the text information inputted or selected by a user, creates an animation character movement by using the analyzed information, and selects an object and a background by using the analyzed information (Abstract).

As recited in claim 18, the control unit 201 edits the animation image based upon the feeling expression information in the reply e-mail. ("*Next, in regard to the Mark data being the feeling information data, the edition of `Eat_LAUMEN` as the animation movement data is carried out with the Feeling expression creation program 20304. As the Mark data are sent, the Feeling expression creation program fetches the movement data `Eat_LAUMEN` stored in the animation movement data. Next, the expression data associated with the Mark data are created, which are stored as the movement data `Eat_LAUMEN` with the Mark data added*

on (S2007). This edition is allowed to use the Feeling expression creation program having the animation edition function, such as the sign language edition software 'Mimehandll'" [0063]; "*Especially, the character movement file takes on the data format that allows the edition of the movement file, so that the file can use the data format disclosed in the JP-A No. 315185/1996, for example*". [0061]).

As recited in claim 19, the control unit 201 synthesizes the animation image showing a general movement or a sign language movement as selected by a user via the mobile terminal. ([0058]).

The above features of the present invention allow intuitional understanding of entered text information and the like at a glance of the animation image without reading the text information. In addition, the invention supports a sight language mode.

Applicants contend that none of the cited references teaches or suggests such "a word-image associating dictionary 20208 (Fig. 10) associating the words with respective display information thereof by animation character movement, object, and background", or such "an animation character input or selected by a user", or such a The control unit 201 controls processes of: (1) "collating each collated word in the word dictionary with the display information in the word-image associating dictionary and extracting collated display information of an associated animation character movement, object, and background;" (2) "synthesizing an animation image of the selected animation character in a real-time manner using the extracted display information of the associated animation character movement and the selected feeling expression information;" and (3) "creating an animation file in which the synthesized animation image is stored together with the extracted display information of the associated object and the associated background in a superposed manner" as in the present invention.

In contrast, Tetsushi merely inserts a character image information identifier in a mail text to create a cartoon mail (Figs. 4-6, for example). Tetsushi animation character is predetermined, rather than as "input or selected by a user." Tetsushi fails to disclose any such "a word-image associating dictionary" which associates the words with respective display information thereof by animation character movement, object, and background. As shown in its drawings, Tetsushi merely shows an animation character, but not object (e.g., food) or background (e.g., place) as the present invention. As such, Tetsushi does not "collate each collated word in the word dictionary with the display information in such a word-image associating dictionary and extracting collated display information of an associated animation character movement, object, and background" as the present invention.

In addition, as admitted by the Examiner, Tetsushi does not teach synthesizing an animation image representing selected feeling expression of the sender (p. 3, paragraph No. 8, lines 12-13 of the outstanding Office Action). As such, Tetsushi does not "create an animation file in which the synthesized animation image is stored together with the extracted display information of the associated object and the associated background in a superposed manner" as the present invention. As shown in its drawings, Tetsushi does not incorporate object (e.g., food) or background (e.g., place) into an animation image (e.g., Fig. 11) as the present invention.

Masanori was relied upon by the Examiner to cover the synthesizing process. However, Masanori registers only one animation character in advance, i.e., predetermined, rather than as "input or selected by a user." "*The character image data corresponding to it is registered into the character database 15, the character database 15 is collated with user ID, such as an electronic mail, based on the user ID of addressers, such as a received electronic mail, and, specifically, the corresponding character image data is extracted* [0030]". The expression of the predetermined animation character is registered and then displayed on a screen according to the contents of conversation (Fig. 9), for example, laughing at the time of "delightful" contents, and getting all excited, when it becomes deep-blue when a tear "is dreadful" at the time of "sad" contents ([0046]. As such, Masanori does not "synthesize an animation image of the ***selected*** animation character representing with selected feeling expression of the sender in a real-time manner" as does the present invention.

Masanori also fails to disclose any such "a word-image associating dictionary" which associates the words with respective display information thereof by animation character movement, object, and background. As shown in its drawings, Masanori merely shows an animation character, but not object (e.g., food) or background (e.g., place) as the present invention. As such, Masanori does not "collate each collated word in the word dictionary with the display information in such a word-image associating dictionary and extracting collated display information of an associated animation character movement, object, and background" as does the present invention.

Applicants contend that none of the cited references or their combinations teaches or discloses each and every feature of the present invention as recited in independent claims 1 and 14-15. As such, the present invention as now claimed is distinguishable and thereby allowable over the rejections raised in the Office Action. The withdrawal of the outstanding prior art rejections is in order, and is respectfully solicited.

Conclusion

In view of all the above, clear and distinct differences as discussed exist between the present invention and the prior art references upon which the rejections in the Office Action rely, Applicants respectfully contend that the prior art references cannot anticipate the present invention or render the present invention obvious. Rather, the present invention as a whole is distinguishable, and thereby allowable over the prior art.

Favorable reconsideration of this application is respectfully solicited. Should there be any outstanding issues requiring discussion that would further the prosecution and allowance of the above-captioned application, the Examiner is invited to contact the Applicants' undersigned representative at the address and telephone number indicated below.

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